

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

In Re:

Case No: 8:16-bk-03142-MGW

JAMES R. BELL, III and

Chapter 13

LAURA K. BELL

Debtors.

**DEBTORS MOTION TO REINSTATE CHAPTER 13 CASE AND REQUEST FOR
ATTORNEYS FEES**

COMES NOW, the Debtors', James R. Bell, III and Laura K. Bell, by and through the undersigned attorney, and moves this court to reinstate this dismissed Chapter 13 case, and in support thereof states as follows:

1. On April 13, 2016; the Debtors' filed Chapter 13 Bankruptcy.
2. November 30, 2017; the Debtors' were dismissed for failure to turn over their 2016 tax refund. (Document No. 32)
3. On December 21, 2017, the Debtors' sent payment in the amount of \$5,836.00, which represents the amount of their 2016 tax refund.
4. Attorney requests \$300.00 in attorney's fees for prosecuting this motion, and an additional \$100.00 should this motion be set for hearing.

WHEREFORE, the Debtors' request that this Court grant the debtor's motion to reinstate the chapter 13 case.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic notice or U.S. mail, to: Trustee Kelly Remmick, PO Box 6099, Sun City, FL 33571 and all creditors and parties in interest as listed on the attached Matrix this 21th day of December, 2017.

/s/ Jose E Lopez
Attorney for Debtor
LawyerASAP, PLLC
150 N. Orange Ave. Suite 303
Orlando, FL 32801
Telephone: 321.320.9200
Florida Bar No.: 53536